

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

City of Chicago;

City and County of Denver; and

Pima County;

Plaintiffs,

vs.

United States Department of Homeland
Security;

Kristi Noem, in her official capacity as
Secretary of the Department of Homeland
Security;

United States Federal Emergency Management
Agency;

David Robinson, in his official capacity as
Acting Administrator of the Federal Emergency
Management Agency;

Defendants.

Case No. 25-cv-5463

Hon. Matthew F. Kennelly

PLAINTIFFS' EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER

Plaintiffs, through undersigned counsel, hereby move the Court for a Temporary Restraining Order pursuant to Federal Rule 65. This motion is based upon all the records, files, and proceedings herein, as well as the legal memoranda, affidavits, exhibits, and arguments of counsel. As described in Plaintiffs' supporting Memorandum and exhibits, Plaintiffs have made a clear showing that immediate and irreparable injury, loss, or damage will result to Plaintiffs if the Court does not grant relief on an emergency basis and without hearing from Defendants.

Plaintiffs therefore request that the Court order enjoin Defendants, their officers, agents, servants, employees, and attorneys from reprogramming and transferring Shelter and Services

Program funds until such time as the Court has ruled on Plaintiffs' Motion for Preliminary Injunction.

Dated: July 12, 2025

Respectfully Submitted,

Mary B. Richardson-Lowry,
Corporation Counsel of the City of Chicago

By: /s/ Lucy Prather

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